Case 3:11-cv-02918-MEJ Document 18 Filed 08/04/11 Page 1 of 3

	I Substitute of Section 1	10 1 110 10 10 17 1 1 1 1 1 1 1 1 1 1 1
1	GRELLAS SHAH LLP GEORGE GRELLAS, ESQ. (SBN 83540)	
2	(gg@grellas.com) DHAIVAT H. SHAH, ESQ. (SBN 196382)	
3	(ds@grellas.com) 20400 Stevens Creek Blvd, Suite 280	
4	Cupertino, CA 95014 Telephone: (408) 255 - 6310	
5	Facsimile: (408) 255 - 6350	
6 7	Attorneys for Plaintiffs GLOBALNAVSOURCE, INC. and TRAILBEHIND, INC.	
8	UNITED STATE	S DISTRICT COURT
9	NORTHERN DIST	RICT OF CALIFORNIA
10	SAN FRANC	CISCO DIVISION
11	GLOBALNAVSOURCE, INC., a Florida corporation, and TRAILBEHIND, INC., a	Case No.: CV11-02918 MEJ
12	California corporation,	JOINT STIPULATION AND PROPOSED ORDER TO CONTINUE THE
13	Plaintiffs,	DISCOVERY, BRIEFING, AND HEARING SCHEDULE FOR DEFENDANT
14	V.	FOREFLIGHT LLC'S MOTION TO DISMISS
15	FOREFLIGHT LLC, a Nevada limited liability company. and DOES 1-50,	
16	inclusive,	
17	Defendants 	
18		
19		
20		
21		
22		
23		
2425		
26		
27		
28		
_~		
	Crimaterian And Durana 10.1 T. C. ri Di	Dai-C A. 411i C 1 11 E D C 1 2

1	In light of the parties' good faith efforts and progress towards settlement of the above-
2	captioned matter, and pursuant to Civil L.R. 6-12, 7-7(a) and 7-2, and supported by the
3	attached Declaration of David I. Siegel, Plaintiffs GlobalNavSource, Inc. and TrailBehind, Inc.
4	(jointly, the "Plaintiffs") and Defendant ForeFlight LLC ("Defendant") respectfully submit
5	this Joint Stipulation and Proposed Order to Continue Discovery, Briefing, And Hearing
6	Schedule For Defendant's Motion To Dismiss, and request the Court approve the stipulated
7	agreement between the parties, as follows (the "Stipulated Order"):
8	(1) Plaintiffs shall propound and serve limited jurisdictional discovery to Defendant
9	(the "Jurisdictional Discovery") no later than September 16, 2011;
10	(2) Defendant shall respond to the Jurisdictional Discovery on or before October 17,
11	2011; Defendant does not waive the right to object to any individual Jurisdictional
12	Discovery requests or to require that any production of confidential information
13	will take place pursuant to a mutually acceptable protective order;
14	(3) Plaintiffs' opposition to Defendant's Motion to Dismiss pursuant to Fed. R. Civ. P.
15	12(b)(2) (the "Motion to Dismiss") shall be filed on or before November 4, 2011;
16	(4) Defendant's reply in further support of its Motion to Dismiss shall be filed on or
17	before November 16, 2011;
18	(5) Plaintiffs and Defendant will request a mutually agreeable hearing date for the
19	Motion to Dismiss, to be set for on or after December 1, 2011.
20	Respectfully submitted,
21	GRELLAS SHAH LLP PATTERSON SHERIDAN LLP
22	By:By:
23	Dhaivat H. Shah, Esq. Keith Jaasma, Esq.
24	Attorneys for Plaintiffs GLOBALNAVSOURCE, INC. and TRAILBEHIND, INC. Attorneys for Defendant FOREFLIGHT LLP
25	//
26	
27	
28	

Case 3:11-cv-02918-MEJ Document 18 Filed 08/04/11 Page 3 of 3

CERTIFICATION OF CONCURRENCE I, Dhaivat H. Shah, attest that Keith Jaasma has concurred in the filing of this document.	
	Dilaivat II. Silaii
PURSUANT TO STIPULATION, IT IS SO ORDERED.	
	Ву:
	Hon. Mary Llena James United States Magistrate Judge
	August 4, 2011
	Date: _ August 4, 2011
	2